



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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OFFICE OF THE  
REGIONAL ADMINISTRATOR

July 21, 2014

Anne Rowe  
NGB/A7AM, 3501 Fetchet Avenue  
Joint Base Andrews MD  
20762-5157

RE: Comments on the Final Environmental Impact Statement for the Second Main Operating Base KC-46A Beddown at Alternative Air National Guard Installations (CEQ # 20140174)

Dear Ms Rowe:

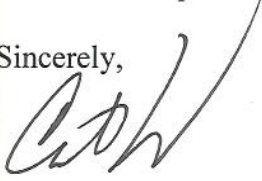
The Environmental Protection Agency-New England Region (EPA) has reviewed the United States Air Force (USAF) Final Environmental Impact Statement (FEIS) for the establishment of a Second Main Operating Base for the KC-46A refueling aircraft beddown at alternative Air National Guard Installations. We submit the following comments on the FEIS in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The FEIS describes the work necessary to establish a Second Main Operating Base (MOB 2) for beddown (homebasing) of the new KC-46A refueling aircraft. The FEIS analyzes five alternative locations for the action including: Forbes Air National Guard Station (ANGS), Kansas; Joint Base McGuire-Dix-Lakehurst (JB MDL), New Jersey; Pease ANGS, New Hampshire; Pittsburgh ANGS, Pennsylvania; and, Rickenbacker ANGS, Ohio. Pease ANGS is identified as the preferred alternative location for the beddown.

EPA's comments on the DEIS did not identify any objections to the preferred alternative but they did identify additional information we believed necessary in order to more fully describe and clarify the potential environmental impacts associated with the alternatives considered in the DEIS. Of our concerns identified, we believe that those related to selection of the preferred alternative, fuel jettisoning, Environmental Justice and the protection of children, and Leadership in Energy & Environmental Design (LEED) should be more fully addressed and we strongly encourage the USAF to provide more comprehensive responses prior to the close of the NEPA process. The attachment to this letter describes our outstanding comments. Thank you for the opportunity to review the FEIS.

Please contact Timothy Timmermann, Associate Director of EPA New England's Office of Environmental Review at 617-918-1025 or [timmermann.timothy@epa.gov](mailto:timmermann.timothy@epa.gov), with any comments or questions about this letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Spalding', with a long, sweeping horizontal stroke extending to the right.

H. Curtis Spalding  
Regional Administrator

Attachment

## **Additional Detailed Comments Regarding the FEIS for the Second Main Operating Base KC-46A Beddown at Alternative Air National Guard Installations**

### General Comments on Selection of Preferred Alternative and Fuel Jettisoning

The FEIS does not provide any response to comments EPA offered in the DEIS related to the selection of a preferred alternative and fuel jettisoning. It is not clear why our comments were not identified for response in the FEIS. We request a response to our comments prior to the close of the NEPA process for the project.

### Groundwater

Our comments on the DEIS suggested establishing a baseline groundwater quality profile (through sampling) in order to evaluate any future impacts from the installation. Our comments also suggested that the FEIS should describe any expected changes to water quality specifically in the context of storm water, deicing chemicals, or fire-fighting agents. The FEIS response to these comments is simply "... no changes to water quality of surface water or groundwater is expected as a result of the Proposed Action." This response states the conclusion that no impacts are expected without any discussion of analysis done to reach this conclusion.

### General Conformity

EPA's comments on the DEIS (found in the FEIS on Page B6-309) identified the General Conformity de minimis thresholds of 50 tons per year of volatile organic compounds (VOC) and 100 tons per year of nitrogen oxides (NOx) for the Boston-Manchester-Portsmouth (SE), NH maintenance area, [ozone maintenance area within the Ozone Transport Region see 40 CFR §93.153(b)(2)]. The FEIS continues to incorrectly identify the General Conformity de minimis thresholds for the Boston-Manchester-Portsmouth (SE), NH ozone maintenance area as 100 tons per year of NOx and VOC [examples see Page 3-61, Page D2-2, and Page D2-3].

However, the net annual emissions from the proposed Pease Air National Guard Alternative are calculated at 10.99 tons of NOx and 1.64 tons of VOC during construction; and 83.60 tons of NOx and 13.31 tons of VOC during operation [see Page D2-5]. Therefore we concur with the FEIS conclusion that the annual level of NOx and VOC from Alternative Three – Pease Air National Guard Station are below the General Conformity applicability rate of 100 tons per year of NOx and 50 tons per year of VOC. General Conformity is not triggered by Alternative Number Three – Pease Air National Guard Station.

### Environmental Justice and the Protection of Children

EPA's DEIS comments recommended mapping of low-income and minority populations and children under 18 years of age to better illustrate potential impacts. The FEIS notes that mapping was not done because the resulting maps would be "cluttered and difficult to read." This rationale is difficult to understand as maps depicting this type of information are routinely prepared and included in EIS documents.

LEED

EPA's request for additional detail regarding the proposed LEED measures was not addressed in the response to comments.